

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

ASSOCIATION OF AMERICAN UNIVERSITIES,
ET AL.,

Plaintiffs,

v.

DEPARTMENT OF HEALTH AND HUMAN
SERVICES, ET AL.,

Defendants.

Case No. 1:25-cv-10346

MOTION FOR LEAVE TO FILE MEMORANDUM EXCEEDING TWENTY PAGES

Pursuant to Local Rule 7.1(b)(4), Plaintiffs hereby move for leave to file an overlength memorandum of 37 pages in support of Plaintiffs' Motion for a Temporary Restraining Order. *See* Local Rule 7.1(b)(4) (permitting overlength memoranda with leave of court).

Plaintiffs have good cause to request leave to file an overlength brief given the factual complexity of the issues before the Court; the scope and national significance of the claims, which implicate a vast array of federally funded research programs; and the highly compressed timeline Plaintiffs had to prepare the brief following Defendants' February 7, 2025, announcement of the Guidance at issue in this lawsuit. Plaintiffs submit that additional space to develop necessary factual background and address the governing legal principles will aid the Court in resolving the issues presented. Granting this Motion will not result in any prejudice, and Plaintiffs would be amenable to a corresponding extension for any opposition filed by Defendants. Accordingly, Plaintiffs respectfully request that this Court grant this motion for leave to file an overlength brief.

On February 10, 2025, counsel for Plaintiffs notified counsel for Defendants regarding the contents of this Motion. Pursuant to Local Rule 7.1, counsel for Plaintiffs provided notice of the

contents of this Motion to the following individuals at the U.S. Department of Justice by electronic mail:

Eric J. Hamilton
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Raymond Farquhar
Chief, Defensive Litigation, Civil Division
U.S. Attorney's Office for the District of Massachusetts
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Plaintiffs have not yet had an opportunity to meet and confer with Defendant's counsel, but Plaintiffs are proceeding with this filing given the need for prompt relief as set forth in the memorandum of law in support of Plaintiffs' motion for a temporary restraining order.

Respectfully submitted,

/s/ Shoba Pillay
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Dated: February 10, 2025

CERTIFICATE OF SERVICE

Counsel for Plaintiffs certify that they have submitted the foregoing document with the clerk of court for the District of Massachusetts, using the electronic case filing system of the Court. Counsel for Plaintiffs hereby certify that they have served all parties electronically or by another manner authorized by Fed. R. Civ. P. 5(b)(2).

/s/ Shoba Pillay
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**[PROPOSED] ORDER GRANTING PLAINTIFFS' MOTION TO FILE
MEMORANDUM EXCEEDING TWENTY PAGES**

The Court hereby grants Plaintiffs' Motion for leave to file a memorandum exceeding twenty pages in length in support of Plaintiffs' Motion for a temporary restraining order.

/s/
District Judge